

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

JANE DOE,)	
)	
Plaintiff/Counterclaim Defendant,)	
)	
vs.)	
)	
BROWN UNIVERSITY,)	
)	
Defendant/Crossclaim Defendant,)	Case No.: 1:23-cv-00376-WES-LDA
)	
and)	
)	
JOHN STILES,)	
)	
Defendant/Crossclaim and)	
Counterclaim Plaintiff.)	
)	

DEFENDANT STILES' MOTION TO TEMPORARILY UNSEAL

Defendant John Stiles requests the temporary unsealing of docket item no. 4 and the Court's September 28, 2023 text order. This motion is supported by L.R. Gen. 102(c) and the following circumstances.

On September 28, 2023, the Court entered a text order sealing several filings, including the plaintiff's complaint and the motion to seal the complaint (docket item no. 4), and granted Mr. Stiles leave to proceed pseudonymously. Recently, Mr. Stiles discovered that "pacermonitor.com" picked up an unredacted copy of the complaint and published it on its website, where it remains available today. Consequently, a Google search now retrieves results that link this action to Mr. Stiles' true name. To remove these items from the internet and Google's search results, Google requires submission of the order sealing the complaint. Because the order only references motions by docket number, it is also necessary to submit the motion to seal, which is docket item no. 4, so recipients will know what relief the motion requested.

WHEREFORE, Defendant John Stiles requests that the Court temporarily unseal its September 28, 2023 text order and docket item no. 4 to allow Mr. Stiles to provide copies to Google and pacermonitor.com to effectuate the removal of the plaintiff's complaint from the internet and

Google's search results.

Counsel for plaintiff and counsel for Brown University do not oppose this motion.

Date: April 3, 2025

The Defendant, John Stiles,
by his Attorney,

/s/ J. Richard Ratcliffe

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CERTIFICATE OF SERVICE

I, J. Richard Ratcliffe, certify that on April 3, 2025, this document was electronically filed through the Court's CM/ECF system and is available for viewing and downloading to all registered counsel of record.

/s/ J. Richard Ratcliffe